



**Livestock and Seed Program
Audit, Review, and Compliance Branch
Quality System Audit Report**

AUDIT INFORMATION

Applicant Name:	Global Culture
Est. Number:	N/A
Physical Address:	245 Anchor Way, Crescent City, CA 95531
Mailing Address:	P.O. Box 1640, Crescent City, CA 95531
Contact & Title:	Linda Van Hook, Executive Director
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Phone Number:	707-464-6913
Auditor(s):	Martin Friesenhahn, Lead Auditor; Vickie Robertson, Second Auditor
Program:	National Organic Program (NOP)
Audit Date(s):	September 9, and 12-14, 2005
Audit Identifier:	NP5252BBA
Action Required:	Yes
Audit Type:	Surveillance Audit (Initial On-site Audit)
Audit Objective:	To verify continuing compliance to the audit criteria
Audit Criteria:	<ul style="list-style-type: none">• 7 CFR Part 205, National Organic Program; Final Rule – December 21, 2000, (Updated November 03, 2003)• Global Culture's procedures, instructions and applicable documents pertaining to NOP Certification
Audit Scope:	The company's NOP certification procedures, including personnel, processes, procedures, facilities, and related records. The on-site inspection observations did not include wild crop operations.
Location(s) Audited:	Global Culture Office in Crescent City, CA; Dancing Gardens in Willow Creek, CA; and Kinetic Koffee in Arcata, CA.

Global Culture was accredited as a certifying agent by the NOP on April 14, 2003 for crops, wild crops, livestock, and handling operations. Global Culture has approximately 57 NOP certified operations with the majority for crops (46 crop, 4 livestock, and 14 handling operations). Global Culture has no NOP certified wild crop operations. Most of the operations certified by Global Culture are located in California with several in Oregon.

The inspections observed during the audit were follow-up inspections of previously certified clients. The inspection at Dancing Gardens included crops and poultry. The inspection at Kinetic Koffee included the processing of organic and conventional coffee.



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FINDINGS

Observations made, interviews conducted, and procedures and records reviewed verified that Global Culture is currently operating in compliance to the audit criteria except as noted in the non-compliances. The on-site audit identified two major and four minor non-compliances.

NP5252BBA.NC1 - Major – Organic production and handling system plan – 205.201 – An organic production or handling system plan must include: (1) A description of practices and procedures to be performed and maintained.... (2) A list of each substance to be used..... Livestock Feed – 205.237(a) The producer of and organic livestock operation must provide livestock with a total feed ration.... Livestock Health Care Practice - 205.238 (b)(1) allows parasiticides – Ivermectin to be used under 205.603(a)(13) for breeder stock prior to the last third of gestation only in emergency treatment when the organic system plan–approved preventative management does not prevent infestation and 205.238(c)(4) prohibits the organic livestock producer from administering synthetic parasiticides on a routine basis. *The livestock organic system plan submitted by the Neff Family Ranch for Angus cattle did not include the required information. The plan did not include the numbers of organic or conventional breeder stock, the source of organic cattle, the grazing plan, or the sources of supplements to be used. The plan also listed Ivomec (Ivermectin) as a vaccination that would routinely be used on Breeder Stock within the first two thirds of gestation. The ranch was certified organic for livestock by Global Culture despite the deficient organic system plan and the use of Ivermectin. However, it was noted during interviews of the Chief Inspector that the intention of the ranch was to certify the organic cattle at the next inspection.*

NP5252BBA.NC2 - Major – Annual report, recordkeeping, and renewal of accreditation - 205.510(a)(1-5) – An accredited certifying agent must submit annually to the Administrator, on or before the anniversary date of the issuance of the notification of accreditation, the following reports..... *Global Culture did not submit the 2005 annual update by April 14, 2005, as required.*

NP5252BBA.NC3 – Minor – USDA Seal - Section 205.311(b) requires the USDA seal to be replicated in the form and design of the example in the Rule and (2) requires the USDA seal in the black and white color scheme to be on a white or transparent background with a black outer circle. *The labels verified by the inspector during the witness audit at Kinetic Koffee in Arcata, California contained a sticker of the USDA seal applied to retail packages of coffee. The seal observed was in the black and white color scheme but did not have the black outer circle as required.*

NP5252BBA.NC4 – Minor – On-site inspections - Section 205.403 (c) – Requires the on-site inspection to verify (1) The operators compliance or capability to comply with the Act and the regulations in this part; (2) That the information, including the organic production or handling system plan, provided in accordance with sections 205.401, 205.406 and 205.200, accurately reflects the practices used or to be used by the applicant for certification or by the certified operation. *The on-site inspections witnessed by the auditor, and a review of files revealed that the inspector did not adequately verify the recordkeeping requirements as stated in section 205.103(b)(2). The inspection documentation did not adequately trace transactions from receipt through final production and storage and/or shipping.*



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NP5252BBA.NC5 - Minor - Granting certification – certificates - 205.404(b)(2) – The certifying agent must issue a certificate of organic operation which specifies the effective date of certification. In addition, updated or revised certificates are to include the date the certificates are revised as listed in 205.406(d). *The Global Culture NOP certificates that were updated did not include the effective date that the operation was first certified to the NOP or the revised date. .*

NP5252BBA.NC6 – Minor – Fees and other charges for certification - Section.205.642 states, “....a certifying agent shall charge applicants for certification and certified production and handling operations only those fees and charges that it has filed with the Administrator. The certifying agent shall provide all persons inquiring about the application process with a copy of its fee schedule.” *The fees charged to applicants were not consistent with the fee schedule. Discounts were offered to a group of producers that were all located within the same area, the renewal fee of \$50.00 was not on the fee schedule and the fee schedule was not provided to all parties that inquired about certification.*